

Joel E. Tasca
Nevada Bar No. 14124
Holly Ann Priest
Nevada Bar No. 13226
Kyle A. Ewing
Nevada Bar No. 14051
BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
Las Vegas, NV 89135
Telephone: (702) 471-7000
Facsimile: (702) 471-7070
tasca@ballardspahr.com
priesth@ballardspahr.com
ewingk@ballardspahr.com

Attorneys for HSBC Bank USA, N.A.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HSBC BANK USA, N.A.,

Plaintiff,

vs.

IRIS WU, an individual; NEWPORT
COVE CONDOMINIUM UNIT-OWNERS
ASSOCIATION, INC., a Nevada non-
profit corporation; MATTHEW AYRES,
an individual,

Defendants.

IRIS WU,

Counter-Claimant,

vs.

HSBC BANK USA, N.A.;
DOES 1 through X and ROE BUSINESS
ENTITIES 1 through X,

Counter-Defendants.

Case No. 2:16-CV-02786-APG-CWH

**STIPULATED AND PROPOSED
ORDER TO AMEND SCHEDULING
ORDER (ECF NO. 28)
(First Request)**

Pursuant to Fed. R. Civ. P. 16(b)(4), LR IA 6-1 and LR 26-4, Plaintiff HSBC Bank USA, N.A. ("HSBC"), Defendant Newport Cove Condominium Unit-Owners Association, Inc. (the "HOA"), and Defendants Iris Wu ("Wu") (collectively, the

1 “Parties”) by and through their undersigned counsel of record, hereby stipulate to
2 amend the Scheduling Order approved on November 13, 2017 (ECF No. 28). This is
3 the Parties first request for an extension of the subject deadlines.

4 A. Discovery completed: HSBC served initial disclosures on December 06,
5 2017. HSBC served its initial expert disclosure on March 3, 2018. HSBC served
6 written discovery on the defendants and the deposition of a third party, Alessi &
7 Koenig, has been noticed by HSBC.

8 B. Discovery to Be Completed:

- 9 1. Continued production of documents as they are located;
10 2. Written discovery responses;
11 3. Deposition of Parties and third parties.

12 C. Current Discovery Deadlines:

- 13 1. Discovery cut-off: May 5, 2018
14 2. Dispositive motions: June 6, 2018
15 3. Joint pretrial order: July 9, 2018

16 D. Reason for Extending Discovery Plan Deadlines

17 The Parties seek to extend discovery and scheduling dates 30 days. On April 2,
18 2018, HSBC noticed the depositions of the HOA and Wu. The depositions were
19 scheduled for April 30, 2018. After the non-appearance of the HOA for its scheduled
20 deposition, it also came to light that Wu had a scheduling conflict. As such, the
21 parties agreed to extend the discovery schedule to allow the depositions of Wu and
22 the HOA to move forward. The brief extension of 30 days will give HSBC time to re-
23 notice the depositions and conduct them. Further, no parties will be prejudiced by the
24 brief extension to discovery.

25 E. Proposed Schedule for Completed Discovery:

26 Accordingly, all Parties hereby stipulate and jointly request that the Court
27 enter an Amended Scheduling Order to establish the following deadlines:

- 28 1. Discovery cut-off: June 4, 2018

2. Dispositive motions: July 5, 2018

3. Joint pretrial order: August 6, 2018

The Parties make this request in good faith and not for the purposes of delay.

IT IS SO STIPULATED this 2 day of May, 2018.

BALLARD SPAHR LLP

HONG & HONG

By: /s/ Holly Ann Priest
Joel E. Tasca
Nevada Bar No. 14124
Holly Ann Priest
Nevada Bar No. 13226
Kyle A. Ewing
Nevada Bar No. 14051
Nevada Bar No.
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135

By: /s/ Joseph Y. Hong
Joseph Y. Hong, Esq.
Nevada Bar No.: 5995
10781 W. Twain Ave
Las Vegas, Nevada 89135

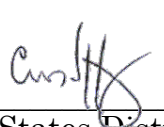
*Attorneys for Plaintiff/Counter-
defendant HSBC Bank USA, N.A.*

HOA LAWYERS GROUP, LLC

By: /s/ Steven T. Loizzi
Steven T. Loizzi, Esq.
Nevada Bar No. 10920
9500 W. Flamingo, Suite 204
Las Vegas, Nevada 89147

ORDER

IT IS SO ORDERED.



United States District Magistrate Judge

DATED: May 3, 2018